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11 Attorneys for Defendants CITY OF NAPA and
12 NAPA POLICE OFFICER THOMAS KEENER

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 LUIS ALEJANDRE,

16 Plaintiff,

17 v.

18 CITY OF NAPA, NAPA POLICE OFFICER
THOMAS KEENER, and DOES 1 through 20,
inclusive,

20 Defendants.

Case No. C12-4985 JCS

STIPULATION AND [PROPOSED] ORDER
MOVING CASE MANAGEMENT
CONFERENCE DATE TO ALLOW TIME FOR
COMPLETION OF ADR

22 At the Further Case Management Conference held on November 15, 2013 before Judge Joseph C.
23 Spero, the above-case was referred to Magistrate Judge Nathanael Cousins for a Mandatory Settlement
24 Conference. The Settlement Conference was scheduled for February 6, 2014. Assuming ADR would
25 have been completed by February 6, 2014, the Court ordered a further CMC on Friday, February 14,
26 2014 with a joint CMC Statement due February 7, 2014. However, pursuant to a stipulation between the
27 parties and an Order signed by Magistrate Judge Cousins, the Settlement Conference was moved to
28 March 11, 2014 to allow the parties to obtain the findings and analysis of their jointly-retained forensic

1 pathologist, Dr. Melinek, prior to the Settlement Conference.

2 The parties have met and conferred and agree to a continuance of the Case Management
3 Conference from Friday, February 14, 2014 to Friday, April 4, 2014 in Courtroom G.

4 Based on this good cause, the parties, acting by and through their respective legal counsel,
5 respectfully request that the Court continue the next CMC from Friday, February 14, 2014 at 1:30 p.m. to
6 Friday, April 4, 2014 at 1:30 p.m. to allow time for completion of the Settlement Conference now
7 scheduled for March 11, 2014. The parties must submit a joint Case Management Conference Statement
8 by March 28, 2014.

9 SO STIPULATED:

10 DATED: February 6, 2014

BENNETT & JOHNSON, LLP

12 By: _____ /s/

13 WILLIAM C. JOHNSON
14 Attorneys for the Plaintiff
LUIS ALEJANDRE

15 DATED: February 6, 2014

BERTRAND, FOX & ELLIOT

17 By: _____ /s/

18 GREGORY M. FOX
19 Attorneys for the Defendants
CITY OF NAPA and NAPA POLICE
OFFICER THOMAS KEENER

1 **ATTORNEY ATTESTATION**

2 I hereby attest that plaintiff's counsel Mr. Johnson has reviewed this stipulation and proposed
3 order and authorized me to show his consent by his signature indicated by a conformed signature ("s/")
4 within this E-filed document.

5
6 Dated: February 6, 2014

7
8
9
10 _____
11 /s/
12 Gregory M. Fox

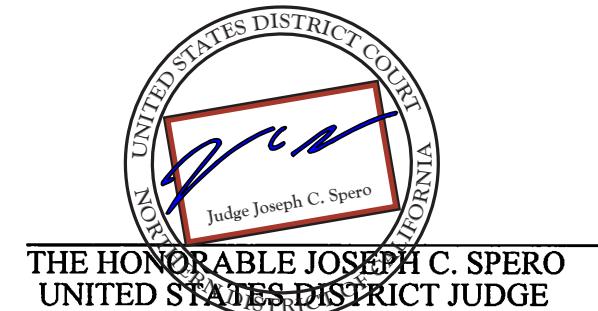
13 **ORDER**

14 Having considered the stipulated request of the parties, and good cause appearing the Court
15 orders as follows:

16 The Case Management Conference will be continued from Friday, February 14, 2014 at 1:30 p.m.
17 to Friday, April 4, 2014 at 2:00 p.m. A joint Case Management Conference Statement to be filed by
18 Friday, March 28, 2014.

19 IT IS SO ORDERED.

20 DATED: _____
21 2/10/14



22 THE HONORABLE JOSEPH C. SPERO
23 UNITED STATES DISTRICT JUDGE
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